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August 22, 2022

## Via ECF

Hon. Ronnie Abrams United States District Court Southern District of New York 40 Foley Square, Room 2203 New York, NY 10007

Re: Michael Stokes v. RBSB LLC d/b/a Rock Bar

Docket No: 1:22-cv-05253-RA

## Dear Judge Abrams:

We are the attorneys for Plaintiff Michael Stokes in this matter and write to respectfully request that the Court adjourn all deadlines, as well as the Initial Conference scheduled for August 26, 2022 at 4:30 p.m., sine die.

Plaintiff makes this request as Defendant RBSB LLC d/b/a Rock Bar is in default of appearing and answering the complaint, and the Clerk's Certificate of Default was entered against Defendant on August 10, 2022 [Dkt. No. 11]. If Defendant does not respond or appear in the action, Plaintiff intends to proceed with its motion for default judgment within forty-five (45) days. Pursuant to Section 1(D) of Your Honor's Individual Rules and Practices:

- (1) the original date of the Initial Conference is August 10, 2022;
- (2) no previous requests for adjournment or extension have been made;
- (3) no previous requests were granted or denied;
- (4) No other dates will be impacted by this request as Defendant is currently in default of answering or appearing [Dkt. No. 11]. Defendant has failed to appear and therefore neither consents to nor opposes the requested relief.

Thank you for the Court's time and consideration of this request.

Application granted. The initial status conference is hereby adjourned sine die. Plaintiff shall move for default on or before October 14, 2022.

Respectfully submitted,

/s/ Renee J. Aragona Renee J. Aragona

Counsel for Plaintiff

SO ORDERED.

Hon. Ronnie Abrams

8/23/22